

REMARKS/ARGUMENTS

Claims 1-18 are pending in the present application. Claims 1, 5, and 10 were amended. By this amendment no claims were canceled or added. Reconsideration of the claims is respectfully requested.

Claims 1, 5, and 10 were amended to correct minor typing errors.

I. 35 U.S.C. § 103, Obviousness: Claims 1, 5, 7, 10, 14, and 16

The Examiner has rejected claims 1, 5, 7, 10, 14, and 16 under 35 U.S.C. § 103 as being unpatentable over Reshef et al., Method and System for Protecting Operations of Trusted Internal Networks, U.S. Patent No. 6,321,337, November 20, 2001 (hereinafter "Reshef") in view of Petty et al., InfiniBand Channel Adapter for Performing Direct DMA Between PCI Bus and InfiniBand Link, U.S. Patent No. 6,594,712, July 15, 2003 (hereinafter "Petty"). This rejection is respectfully traversed.

The Final Office Action states:

a. As per claims 1 and 10, Reshef teaches: pre-posting command buffers, wherein the buffers contain external small computer system interface commands (lines 19-45 of column 16); receiving a command (lines 44-60 of column 6); translating the command to form a translated command, and sending the translated command to the device (lines 9-18 of column 13); and performing the new translated command within the internal subnet (lines 19-26 of column 13).

Reshef does not explicitly teach: InfiniBand isolation bridge and InfiniBand host system. However, Petty discloses: "In another aspect, it is a feature of the present invention to provide an InfiniBand channel adapter that includes a bus router that receives an InfiniBand RDMA Read Response packet, having a payload of data, transmitted by a remote InfiniBand node," (lines 29-33 of column 3). It would have been obvious to one of ordinary skill in the art at the time of the applicant's invention to include an InfiniBand isolation bridge and InfiniBand host system. "The channel adapter also includes a local bus interface, in communication with the bus router, that provides the payload of data to an I/O controller coupled to the local bus interface by a local bus if a local bus address specified by the I/O controller is within a predetermined address range of the local bus address space," (lines 33-38 of column 3 in Petty). It is for this reason that one of ordinary skill in the art at the time of the applicant's invention would have been motivated to include an InfiniBand isolation bridge and InfiniBand host system functionality in the system as taught by Reshef.

Final Office Action dated April 7, 2006, pages 2-3.

The Examiner bears the burden of establishing a *prima facie* case of obviousness based on the prior art when rejecting claims under 35 U.S.C. § 103. *In re Fritch*, 972 F.2d 1260, 23 U.S.P.Q.2d 1780 (Fed. Cir. 1992). When comparing Reshef to the claimed invention, the claim limitations of the presently claimed invention may not be ignored in an obviousness determination.

Independent claim 1 of the present invention, which is representative of independent claim 10 with regard to similarly recited subject matter, recites:

1. A computer implemented method for facilitating communication between an InfiniBand host system and a device with an internal InfiniBand bus structure, the method comprising:
 - pre-posting command buffers to an InfiniBand isolation bridge, wherein the buffers contain external small computer system interface commands;
 - receiving a command from the InfiniBand host system;
 - translating the command from an InfiniBand host system command to a command for the device with an internal InfiniBand bus structure to form a translated command, and sending the translated command to the device with an internal InfiniBand bus structure; and
 - performing the translated command.

Reshef does not teach or suggest the features recited in claim 1. Claim 1 is directed towards facilitating communication between an InfiniBand host system and a device with an internal InfiniBand bus structure. Claim 1 utilizes an InfiniBand isolation bridge. The Final Office Action acknowledges, and Applicants agree, that Reshef does not teach an InfiniBand host system, a device with an internal InfiniBand bus structure, an InfiniBand isolation bridge, or facilitating communication between the InfiniBand host system and the device with an internal InfiniBand bus structure. Instead, Reshef teaches a security gateway between an untrusted computer system and a trusted computer system that also converts received messages into a simplified form for the trusted computer system to use. Reshef does not teach the features of "pre-posting command buffers to an InfiniBand isolation bridge, wherein the buffers contain external small computer system interface commands," and "translating the command from an InfiniBand host system command to a command for the device with an internal InfiniBand bus structure to form a translated command, and sending the translated command to the device with an internal InfiniBand bus structure."

The Final Office Action points to column 16, lines 19-45, which is reproduced below for the Examiner's convenience, as teaching pre-posting command buffers, wherein the buffers contain external small computer system interface commands:

The flow of data coming in to the security gateway 10 in application format through the protocol manager 2c and 4c is shown in FIG. 7. The data arrives in its native application format at step 500 and is read by the protocol manager 2c and 4c from the queue 210 containing data coming from the routing managers 2b, 4b. This application-format data is then transferred to the session manager 220 at step 510. At step 520 the